

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

**WARREN CANNADA,**

**Plaintiff,**

**v.**

**OLD DOMINION BRUSH COMPANY, INC.**

**Defendant.**

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**Case No. 3:20-cv-952**

**JOINT WRITTEN STIPULATIONS OF UNDISPUTED FACTS**

The parties, by counsel, pursuant to Pretrial Schedule A, V 6 of the Court's Scheduling Order (ECF Doc. 8-7), hereby submit the following joint written stipulations of uncontroverted facts, to wit:

1. Old Dominion Brush Company, Inc., ("ODB") was founded in Richmond, VA in 1910.
2. In June of 2017, Alamo Group purchased ODB.
3. Alamo Group is a manufacturing organization comprised of companies with locations in the U.S., Canada, England, France, Australia and Brazil. It is headquartered in Seguin, Texas.
4. Warren Cannada, ("Cannada"), date of birth January 10, 1959, began working at ODB on April 12, 1988, operating a punch press. In 1990, Cannada became a lead man in his department. Following the acquisition by Alamo in 2017, Cannada was assigned the title of Weld and Fabrication Supervisor. He held that title at the time he was terminated from ODB on November 4, 2019.
5. Cannada was age 60 at the time he was terminated.

6. On February 14, 2020, Cannada began working for Specialty's Our Name, Inc. in Ashland, Virginia.

Respectfully submitted,

**WARREN CANNADA**

*Plaintiff,*

By:                     /s/                    

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## CERTIFICATE OF SERVICE

I hereby certify that on the 21st day of February, 2022, I electronically filed the foregoing ***Joint Written Stipulations of Undisputed Facts*** with the Clerk of Court using the CM/ECF system which will send a notification of such filing (NEF) to the following:

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